

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

KIMBERLY HARSMAN, <i>et. al.</i>,)	Case No: 1:21-cv-00597
)	
Plaintiffs,)	JUDGE BLACK
)	
v.)	DEFENDANTS UC HEALTH, LLC,
)	UNIVERSITY OF CINCINNATI
CINICNNATI CHILDREN’S HOSPITAL)	MEDICAL CENTER, LLC, AND
MEDICAL CENTER, <i>et al.</i>,)	UNIVERSITY OF CINCINNATI
)	PHYSICIANS COMPANY, LLC’S
Defendants.)	MEMORANDUM IN OPPOSITION
)	TO PLAINTIFFS’ MOTION TO
)	REMAND

Defendants UC Health, LLC (“UC Health”), University of Cincinnati Medical Center, LLC (“UCMC”), and University of Cincinnati Physicians Company, LLC (“UCPC”) oppose Plaintiffs’ Motion for Remand for all the reasons asserted in the Mercy Defendants’ Memorandum in Opposition to Plaintiff’s Motion for Remand. (Doc. 32) To the extent required, attached as Exhibit 1 is a declaration. Defendants do not know at this stage who will be refusing the vaccine, or who have received but felt threatened or coerced to receive the vaccine or who may be subject to disciplinary action.

For each and every of the reasons asserted in the Mercy Defendants’ Memorandum in Opposition to Plaintiffs’ Motion for Remand and those above, Defendants UC Health, LLC, University of Cincinnati Medical Center, LLC, and University of Cincinnati Physicians Company, LLC respectfully request that the Court deny Plaintiffs’ Motion for Remand.

Respectfully submitted,

/s/ Patricia Anderson Pryor

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Company, LLC ("UCPC")*

CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2021, a true and accurate copy of the foregoing was electronically filed with the Court's CM/ECF system, and such system will send electronic notice to all counsel of record.

/s/ Patricia Anderson Pryor

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